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OFFICE OF THE  
CHIEF COUNSEL  
DEPT. OF TRANSPORTATION  
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**Date:** 6/23/99 5:12 PM  
**Sender:** "John B. Sherman" <John@JumpShack.com>  
**To:** 9-NPRM-CMTS  
**Priority:** Normal  
**Subject:** Parachute inspection Cycle times

To whom it may concern,

The following are comments in reference to increased inspection cycle for reserve parachutes, from 120 days to 180 days.

Increasing the inspection cycle of emergency parachutes from 120 days to 180 days is NOT a good idea.

As a professional parachute rigger, Certificated Manufacturer and loft manager with over 30 years of experience I am opposed to this increase in time between inspection cycles.

I have seen parachutes come into my facility and pass inspection. When the 120day cycle had passed the same canopy was again processed, this time demonstrating characteristics of "Acid Mesh" contamination. When tested the parachute which had, 120 days earlier, passed now failed. One of these parachutes was privately owned by us and we know it had a high standard of care.

The "Acid Mesh" contamination was suspected of being accelerated by heat. Such an acceleration could occur in less than 120 days.

The U.S. Navy has done the definitive study on deployment times on pack jobs up to 5 years. This study did show a deterioration in deployment times as a function of time packed. However, I don't personally believe this is the main issue.

This is an "inspection cycle" and as such the complete assembly must be inspected for airworthiness. Transport and handling can and does cause non-conforming conditions. I will grant that most systems routinely pass the cycle. However, not all do. Therefore, extending the cycle would not be desirable.

John Sherman

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